

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITE HERE HEALTH,)	
)	
MATTHEW WALKER, as fiduciary of UNITE HERE)	
HEALTH,)	CIVIL ACTION
)	
Plaintiffs,)	NO. 12 C 5137
)	
vs.)	JUDGE ROBERT W. GETTLEMAN
)	
RICHARD SIMON, d/b/a United Maintenance Service)	
at Hyatt Regency O'Hare,)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, RICHARD SIMON, d/b/a United Maintenance Service at Hyatt Regency O'Hare, in the total amount of \$295,914.70, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,301.25.

On June 28, 2012, the Summons and Complaint was served on the Defendant's attorney (by mailing copies of said documents, along with the Notice of a Lawsuit and Request to Waive Service of a Summons and Waiver of Service of Summons) (a copy of the Summons and Waiver of Service of Summons is attached hereto). Therefore, Defendant's answer or motion under Rule 12 was due by August 28, 2012. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 11th day of September 2012:

Mr. Richard Simon
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/s/ Laura M. Finnegan

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